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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**JOINT STIPULATION AND
[PROPOSED] ORDER FOR
EXTENSION OF TIME TO RESPOND
TO PLAINTIFFS' ADMINISTRATIVE
MOTION TO SEAL (Dkt. 314)**

Judge: Hon. Richard Seeborg
Courtroom: 3, 17th Floor

JOINT STIPULATION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS'
ADMINISTRATIVE MOTION TO SEAL (DKT. 314)

Case No. 3:20-CV-04688-RS

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al. (“Plaintiffs”) and Defendant Google LLC (“Google”), collectively, the “Parties” submit this joint stipulation.

WHEREAS, on July 20, 2023, Plaintiffs filed an Administrative Motion to File Under Seal materials submitted with Plaintiffs’ motion for class certification (Dkt. 314);

WHEREAS, the deadline for Google to file its response is July 27, 2023 as per Civil Local Rule 79-5(f)(3);

WHEREAS, on July 24, 2023, the Parties agreed that Google could extend its time to respond to Plaintiffs’ Administrative Motion to File Under Seal by two weeks, to August 10, 2023;

WHEREAS, the requested extension of this deadline is made to allow for additional time for Google to secure the appropriate declarants and review the extensive material Plaintiffs attached with their motion for class certification;

WHEREAS, the requested extension is made without prejudice to Google seeking a further extension of time should the circumstances warrant and to the extent appropriate;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties to this action, and pursuant to Civil Local Rules 6-2 and 7-12, that the deadline for Google to file its response to Plaintiffs’ Administrative Motion to File Under Seal be extended to August 10, 2023.

A Proposed Order is submitted concurrently herewith.

IT IS SO STIPULATED.

DATED: July 24, 2023

WILLKIE FARR & GALLAGHER, LLP

By: /s/ Benedict Y. Hur
Benedict Y. Hur

Attorneys for Defendant Google LLC

DATED: July 24, 2023

By: /s/ Ryan McGee

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FILER'S ATTESTATION

Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

DATED: July 24, 2023

WILLKIE, FARR & GALLAGHER LLP

/s/ Benedict Y. Hur

Benedict Y. Hur

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**[PROPOSED] ORDER GRANTING
REQUEST TO EXTEND TIME TO
RESPOND TO PLAINTIFFS'
ADMINISTRATIVE MOTION TO SEAL**

Judge: Hon. Richard Seeborg

Courtroom: 3, 17th Floor

**[PROPOSED] ORDER GRANTING REQUEST TO EXTEND TIME TO RESPOND TO PLAINTIFFS'
ADMINISTRATIVE MOTION TO SEAL**

Case No. 3:20-CV-04688-RS

1 Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that the new deadline for
2 Google to respond to Plaintiffs' Administrative Motion to Seal be extended to August 10, 2023.

3
4 **IT IS SO ORDERED.**

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9 Dated: _____

Honorable Richard Seeborg